CURRICULUM VITÆ 2016-02

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Professional Experience

Director, Regulatory Studies Center, and Distinguished Professor of Practice, Trachtenberg School of Public Policy & Public Administration, The George Washington University. (September 2009 to present) Established the GW Regulatory Studies Center to raise awareness of regulations' effects and improve regulatory policy through research, education, and outreach. Housed in the Trachtenberg School of Public Policy and Public Administration, the Center is a leading source for applied scholarship on regulatory issues, and a training ground for current and future policy officials who want to understand the effects of regulation and ensure that regulatory policies are designed to make the public better off.

Administrator, Office of Information & Regulatory Affairs, Office of Management and Budget. (April 2007-January 2009) (*Counselor,* January 2007-April 2007) Nominated by the President on July 31, 2006 and appointed on April 4, 2007 to head the office that reviews draft executive branch regulations under Executive Order 12866, and collections of information under the Paperwork Reduction Act. The Office develops and oversees the implementation of government-wide policies in the areas of information technology, information policy, privacy, and statistical policy. OIRA also oversees agency implementation of the Information Quality Law, including the peer review practices of agencies. Served as lead US official on international regulatory issues, including Co-Chair of the EU-US High Level Regulatory Cooperation Forum.

Director, Regulatory Studies Program, Mercatus Center at George Mason University. (October 2003 to January 2007) (*Senior Research Fellow & Deputy Director*, October 1998 to October 2003) Directed the research and outreach efforts of this non-profit research and educational program, which analyzes federal regulatory actions from the perspective of the public interest, and serves as a bridge between academics and policymakers on regulatory issues. Authored comments, papers, and articles, and presented research results to the media, Congressional staff and other interested parties.

Adjunct Professor of Law, George Mason University School of Law. Developed and taught courses and clinics on regulation. (Fall 2002 to Spring 2006)

Adjunct Professor, Georgetown University. Taught Bryce Harlow Institute on Business and Government Affairs course, "Business, Government, and Public Policy." (Summer 2003, 2004)

Instructor, ExNet Utility Management Programs, and individual electric utility companies. (1996 to 2002) Developed and taught 1- and 2-day courses to utility executives on managing energy risks with derivatives instruments.

Vice President and Director of Environmental Analysis, Economists Incorporated. (1991 to 1998) Provided economic and policy analysis for private and public clients on environmental and energy issues.

Economist Advisor to Commissioner Albrecht, Commodity Futures Trading Commission. (1989 to 1991) Advised Commissioner on regulatory and financial issues related to derivative instruments and trading.

Deputy Chief, Natural Resources Branch, Office of Information and Regulatory Affairs, Office of Management and Budget. (1985 to 1989) As *Deputy Chief* (from July 1987), supervised staff responsible for oversight of regulatory policy at Environmental Protection Agency and Department of Energy; developed and negotiated Administration's regulatory and legislative positions. As *Senior Economist*, reviewed environmental regulations, and their supporting impact analyses, to ensure they provided net benefits to society.

Financial Consultant, Environmental Protection Agency. (1984 to 1985) Formulated economic incentives to make the enforcement of environmental regulations more effective. Developed the financial model for calculating non-compliance penalties that has been incorporated in EPA's enforcement policy. Served as expert for the Department of Justice in civil penalty negotiation.

Associate, Putnam, Hayes and Bartlett, Inc. (1981 to 1984) Provided financial and economic analysis to the U.S. Government for environmental and energy policy decisions. Analyzed the impact on private sector clients of legislation, regulation and competitor behavior.

Financial Analyst, General Electric Company. (Summer 1980)

Research Associate, Temple, Barker & Sloane, Inc. (1978 to 1979)

Research Assistant, Charles River Associates. (1977 to 1978)

Education

S.M. Sloan School of Management, Massachusetts Institute of Technology, 1981. Concentrations in applied economics and finance.

B.S. (*summa cum laude*) Resource Economics, University of Massachusetts, 1977.

Professional Activities

President, Society for Benefit Cost Analysis (Board member since December 2012)

Fellow, National Academy of Public Administration (Fall 2014 to present)

Public Member, Administrative Conference of the United States (September 2010 to present)

Board Member, Economists Incorporated (2015 to present)

Board Member, National Federation of Independent Businesses Legal Foundation (May 2009 to present; Spring 2005 to January 2007, reappointed May 2009).

Executive Committee Member, Federalist Society Administrative Law and Regulation Practice Group (2009 to present)

Executive Committee Member, Association of Private Enterprise Education (Spring 2005 to January 2007, April 2010 to April 2012).

Member, U.S. Chamber of Commerce, Regulatory Affairs Committee (2003 to 2006)

Member and Working Group Chair, Virginia Environmental Education Advisory Committee. Appointed by Governor Jim Gilmore. (2000 to 2002) Chaired the working group responsible for making recommendations to the Governor regarding resource allocation for environmental education in the Commonwealth.

Member, Virginia Administrative Law Advisory Committee. Appointed by the Virginia Code Commission. (2000 to 2003) The committee advised the Commission and the Virginia General Assembly on matters related to administrative law.

Member, Virginia Waste Management Board. Appointed by Governor George Allen. (1996 to 2001) The Board is responsible for promulgating and enforcing waste management regulations for the Commonwealth of Virginia.

Publications

"Can Fiscal Budget Concepts Improve Regulation?" *NYU J. Legislation & Public Policy*. Forthcoming 2016.

"Regulatory Accretion: Causes and Possible Remedies," *Administrative Law Review*. Forthcoming 2016. With Sofie E. Miller

"Regulatory Science and Policy: A Case Study of the National Ambient Air Quality Standards," GW Regulatory Studies Center Working Paper. September 9, 2015.

"The Role of Transparency in Regulatory Governance: Comparing US and EU Regulatory Systems," *Journal of Risk Research* (2015). With Kai Wegrich.

"The Limits of Irrationality as a Rationale for Regulation." *Journal of Policy Analysis and Management*, Vol. 34, Issue 3 (Summer 2015). With Brian Mannix.

"Please Don't Regulate my Internalities." *Journal of Policy Analysis and Management*, Vol. 34, Issue 3 (Summer 2015). With Brian Mannix.

"Will the Occupational Safety and Health Administration's Proposed Standards for Occupational Exposure to Respirable Crystalline Silica Reduce Workplace Risk?" *Risk Analysis* (Vol. 35 Issue 7, 2015). With Andrew P. Morriss

"Improving Regulatory Accountability: Lessons from the Past and Prospects for the Future" 65 *Case Western Reserve Law Review* 4 (summer 2015).

2016 Regulators' Budget: Increases Consistent with Growth in Fiscal Budget, a joint report of the GW Regulatory Studies Center and the Weidenbaum Center at Washington University in St. Louis. With Melinda Warren, May 19, 2015.

"Stakeholder Participation and Regulatory Policymaking in the United States," draft report for the Organisation for Economic Co-operation and Development. November 2014. With Steven J. Balla.

"Australia's Regulatory 'Bonfire'," *Regulation*, Vol. 37, Number 3. Fall 2014. With Jeff Bennett.

"Tight Budgets Constrain Some Regulatory Agencies, But Not All," *Regulation*, Vol. 37, Number 3. Fall 2014. With Melinda Warren.

"The Social Cost of Carbon," *Engage* Vol. 15, Issue 1. With Brian Mannix. July 24, 2014

2015 Regulators' Budget: Economic Forms of Regulation on the Rise, a joint report of the GW Regulatory Studies Center and the Weidenbaum Center at Washington University in St. Louis. With Melinda Warren, July 9, 2014.

"OSHA's Long-Awaited Silica Rule," *Regulation*, Vol. 37, Number 1. Spring 2014.

"Comment on Löfstedt's 'The substitution principle in chemical regulation: a constructive critique,'" *Journal of Risk Research*, January 2014.

"Making the Social Cost of Carbon more Social," *Regulation*, Vol. 36, Number 4. Winter 2013/2014, with Brian F. Mannix and Sofie E. Miller.

Sequester's Impact on Regulatory Agencies Modest: An Analysis of the U.S. Budget for Fiscal Years 2013 and 2014, a joint report of the GW Regulatory Studies Center and the Weidenbaum Center at Washington University in St. Louis. With Melinda Warren, July 22, 2013.

"OMB's Reported Benefits of Regulation: Too Good to Be True?," *Regulation*, Vol. 36, Number 2. Summer 2013.

"The EPA's Implausible Return on its Fine Particulate Standard," *Regulation*, Vol. 36, Number 1. Spring 2013.

"Is the Execution of the Law Hyper-Partisan?" *The Georgetown Journal of Law & Public Policy*, Vol. 10 (summer 2012)

Regulation: A Primer. The George Washington University Regulatory Studies Center and the Mercatus Center at George Mason University. August 2012. With Jerry Brito.

"Perpetuating Puffery: An Analysis of the Composition of OMB's Reported Benefits of Regulation," *Business Economics*, Vol. 47, No. 3. National Association for Business Economics, August 2012.

Growth in Regulators' Budget Slowed by Fiscal Stalemate: An analysis of the U.S. Budget for fiscal years 2012 and 2013, a joint report of the GW Regulatory Studies Center and the Weidenbaum Center at Washington University in St. Louis. July 2012. With Melinda Warren.

"Improving the Use of Science to Inform Environmental Regulation," in *Institutions and Incentives in Regulatory Science*, Jason Scott Johnston, ed. Lexington Books 2012. With George M. Gray.

"In Memoriam: William A. Niskanen, The Interview," *Regulation*, Vol. 35, No. 1, Spring 2012.

"Observations on OIRA's 30th Anniversary," *Administrative Law Review*, Vol. 63, Special Edition 2011.

"The (Not So) New Executive Order on Regulatory Review, and What to Expect," *Environmental Law Reporter*, June 2011. ("Dialogue" based on panel discussion.)

"Prospects for Regulatory Reform in 2011," *Engage*, Volume 12, Issue 1, June 2011.

Fiscal Stalemate Reflected in Regulators' Budget: An analysis of the U.S. Budget for fiscal years 2011 and 2012, a joint report of the GW Regulatory Studies Center and the Weidenbaum Center at Washington University in St. Louis. May 2011. With Melinda Warren.

Engaging Stakeholders in Designing Regulation, a joint report of the GW Regulatory Studies Center and the Bertelsmann Stiftung, March 2011.

"Alfred Kahn, 1917-2010," *Regulation*, Vol. 34, No. 1, Spring 2011.

A Decade of Growth in the Regulators' Budget: An analysis of the U.S. Budget for fiscal years 2010 and 2011, a joint report of the GW Regulatory Studies Center and the Weidenbaum Center at Washington University in St. Louis. May 2010. With Melinda Warren.

"The Future of Cost-Benefit Analysis in Environmental Policy," 17 *U. Balt. J. Envtl. L.* 189, Spring 2010. (Based on panel discussion at the Federalist Society 2009 National Lawyers Convention)

"Regulatory Reform: Lessons Learned, Challenges Ahead," *Regulation*, Vol. 32, Number 2, Summer 2009.

"Regulatory Activity in the Bush Administration at the Stroke of Midnight," *Engage*, Vol. 12, Issue 2, Summer 2009.

"The Future of Regulatory Oversight and Analysis," Resources for the Future, Weekly Commentary, June 8, 2009. With Arthur Fraas.

"The Future of Regulatory Oversight and Analysis," Mercatus Policy Series, No. 51, May 2009. With Arthur Fraas.

Updated Principles for Risk Analysis, Memorandum for the Heads of Executive Departments and Agencies, September 19, 2007. With Sharon L. Hays

"Defining What to Regulate: Silica & the Problem of Regulatory Categorization," *Administrative Law Review*, Vol. 58, No.2 (Spring 2006). With Andrew P. Morriss.

Moderating Regulatory Growth: An Analysis of the U.S. Budget for Fiscal Years 2006 and 2007, a joint report of the Mercatus Center at George Mason University and the Weidenbaum Center at Washington University in St. Louis. May 2006. With Melinda Warren.

Primer on Regulation, Mercatus Policy Series; Policy Resource No. 1. Mercatus Center at George Mason University. November 2005.

Upward Trend in Regulation Continues: An Analysis of the U.S. Budget for Fiscal Years 2005 and 2006, a joint report of the Mercatus Center at George Mason University and the Weidenbaum Center at Washington University in St. Louis. June 15, 2005. With Melinda Warren.

eRulemaking: A Case Example of eGov Transformation, Working Paper in Regulatory Studies, Mercatus Center at George Mason University. June 13, 2005. With Richard D. Otis.

"It is Time to Reevaluate the Toxic Release Inventory," *Missouri Environmental Law & Policy Review*, Volume 12, Number 1 (2005)

"Regulatory Review," in *Report Card 2004: Bush Administration's Environmental Policy*, Property and Environment Research Center. Bruce Yandle & Jane Shaw ed. October 2004.

Regulator's Budget Continues to Rise: An Analysis of the U.S. Budget For Fiscal Years 2004-2005, a joint report of the Mercatus Center at George Mason University and the

Weidenbaum Center at Washington University in St. Louis. July 2004. With Melinda Warren.

Regulatory Spending Soars: An Analysis of the U.S. Budget for Fiscal Years 2003 and 2004, a joint report of the Mercatus Center at George Mason University and the Weidenbaum Center at Washington University in St. Louis. July 2003. With Melinda Warren.

A Day in the Life of a Regulated American Family, Mercatus Center at George Mason University. December 2002.

Is 9/11 a Crisis to be Followed by a Leviathan? Mercatus Center Policy Essay. With Bruce Yandle. September 2002.

Regulatory Response: An Analysis of the Shifting Priorities of the U.S. Budget for Fiscal Years 2002 and 2003, a joint report of the Mercatus Center at George Mason University and the Weidenbaum Center at Washington University in St. Louis. June 2002. With Melinda Warren.

*President Expands Oversight Of Federal Agency Rulemaking***,** Washington Legal Foundation *Legal Backgrounder,* November 16, 2001. With Ernest Gellhorn, and Wendy L. Gramm.

"Reversing Midnight Regulations*,"* *Regulation*, Vol. 24, Number 1, Spring 2001.

"OSHA's Ergonomics Program Standard and Musculoskeletal Disorders: An Introduction," with Bradford DeLong, *J. Labor Research,* Volume XXII, Number 1 Winter 2001.

"The Benefits and Costs of OSHA's Proposed Ergonomics Program Standard," *J. Labor Research,* Volume XXII, Number 1 Winter 2001.

"A Fuel and Your Money" *Regulation,* Vol. 23, Number 3. 2000.

"EPA's Proposed Expansion of Noncompliance Benefit Estimates," *Environmental Claims Journal,* Volume 12, Number 2, Winter 2000, with Kent W Mikkelsen.

"Overstressing Business: OSHA and Ergonomics," *Briefly,* NLCPI. October 1999.

"The EPA Relies on Faulty Market Incentives," *Regulation,* 1998, Vol. 21, No. 3.

"Economic Impact Analyses," *Pace Environmental Law Review,* Vol. 16, Number 1, Winter 1998.

"EPA's National Ambient Air Quality Standard for Ozone May be Hazardous to Your Health," *Environmental Law* (Illinois State Bar Association). March 1998, Vol. 28, No. 3.

"Congress and the Clinton OMB: Unwilling Partners in Regulatory Oversight?" *Regulation,* 1997, Vol. 20, No. 4 with Angela Antonelli.

"Shining a Bright Light on Regulators: Tracking the Costs and Benefits of Federal Regulation," *Backgrounder*. No. 1142. The Heritage Foundation. September 30, 1997 with Angela Antonelli.

"OIRA's Conflicting Double Role," *Regulation*, 1997, Vol. 20, No. 3.

"EPA's Ozone Standard May Harm Public Health and Welfare," *Risk Analysis.* Vol. 17, Number 4. (August 1997).

Using Derivatives to Manage Risk. Edison Electric Institute 1997.

Electricity Futures: Potential Impact on Utilities. Edison Electric Institute 1995.

"Discounting Risky Environmental Remediation Costs," *Environmental Claims Journal.* Vol. 7, No. 2. Winter 1994/95.

"Discounting Cash Outflows of Environmental Remediation," *Economists Ink.* Fall 1994.

"Costs and Benefits of Pesticide Ban," *Economists Ink*, Winter 1994.

"Pesticide Problems," *Bio/Technology*, Vol. 11, April 1993.

"Understanding the Clean Air Act: Implementation Issues for Electric Utilities," *Maine Policy Review.*, April 1993, Vol. 2/No. 1.

National Biotechnology Policy Board Report, National Institutes of Health, 1992. 90 pp.

"Environmental Regulation and the Health Care Industry," *Digest of Environmental Law*, Vol. 6, No. 1, 1993.
"The Future of Clean Air Futures," *Public Utilities Fortnightly*, August 1, 1992.

"Clean Air Futures," *Economists Ink*, Spring 1992.

"EPA Civil Penalty Policy," *Economists Ink*, Fall 1991.

Public Interest Comments

"Public Comment on EPA's Proposed Supplemental Finding that it is Appropriate and Necessary to Regulate Hazardous Air Pollutants from Coal- and Oil-Fired EGUs," January 11, 2016.

"Public Comment: OMB's 2015 Draft Report to Congress on the Benefits and Costs of Federal Regulations," with Sofie Miller and Brian Mannix. December 15, 2015

"Comment on OMB's Report to Congress on the Benefits and Costs of Federal Regulation," with Brian Mannix and Sofie Miller. September 2, 2014.

"Retrospective Review Comment on the FMCSA's Proposed Rule: Electronic Logging Devices and Hours of Service Supporting Documents," May 15, 2014.

"Comment on the EPA's Standards of Performance for New Residential Wood Heaters, New Residential Hydronic Heaters and Forced-Air Furnaces, and New Residential Masonry Heaters," May 5, 2014.

"Public Interest Comment on the Interagency Technical Support Document: Technical Update of the Social Cost of Carbon for Regulatory Impact Analysis under Executive Order No. 12866," with Brian Mannix. February 16, 2014.

"Public Interest Comment on the Occupational Safety and Health Administration's Proposed Standards for Occupational Exposure to Respirable Crystalline Silica," With Andrew P. Morriss, December 4, 2013.

Comment on "Reconsideration of the Department of Energy's Final Rule: Energy Conservation Standards for Standby Mode and Off Mode for Microwave Ovens," with Sofie E. Miller and Brian F. Mannix. September 6, 2013.

Comment on the Occupational Safety and Health Administration's "Proposed Standards for Occupational Exposure to Respirable Crystalline Silica," with Andrew P. Morriss, December 4, 2013.

Comment on the OMB's Draft 2013 "Report to Congress on the Benefits and Costs of Federal Regulations," submitted to Office of Management and Budget, with Brian F. Mannix and Sofie E. Miller. July 23, 2013.

Comment on "OMB's 2010 Benefit-Cost Report to Congress," submitted to the Office of Management and Budget. With Art Fraas and Brian Mannix. June 24, 2010.

Comment on "OMB's 2005 Benefit-Cost Report to Congress," submitted to the Office of Management and Budget. *Public Interest Comment Series*, Regulatory Studies Program, Mercatus Center at George Mason University, June 20, 2005.

Comment on "EPA's Proposed Willingness to Pay Survey: Phase III Cooling Water Intake Structures," submitted to the Environmental Protection Agency. *Public Interest Comment Series*, Regulatory Studies Program, Mercatus Center at George Mason University, April 25, 2005. With Daniel Simmons.

Comment on "EPA's Phase III Cooling Water Intake Structures," submitted to the Environmental Protection Agency. *Public Interest Comment Series*, Regulatory Studies Program, Mercatus Center at George Mason University, January 31, 2005. With Daniel Simmons.

Comment on "Draft Report to Congress on the Costs and Benefits of Federal Regulations," submitted to the Office of Management and Budget. *Public Interest*

Comment Series, Regulatory Studies Program, Mercatus Center at George Mason University (2004-04) May 11, 2004.

Comment on "Application of the Safe Drinking Water Act to Submetered Properties," submitted to the Environmental Protection Agency. *Public Interest Comment Series*, Regulatory Studies Program, Mercatus Center at George Mason University (2003-21), October 16, 2003.

Comment on "Cooling Water Intake," submitted to the Environmental Protection Agency. *Public Interest Comment Series*, Regulatory Studies Program, Mercatus Center at George Mason University (2003-15) June 2, 2003. With Daniel Simmons.

Comment on "RIA Guidelines," submitted to the Office of Management and Budget. *Public Interest Comment Series*, Regulatory Studies Program, Mercatus Center at George Mason University (2003-13) May 5, 2003. With Brian Mannix.

Comment on "Office of Management and Budget's Draft 2003 Report to Congress on the Costs and Benefits of Federal Regulation," submitted to the Office of Management and Budget. *Public Interest Comment Series*, Regulatory Studies Program, Mercatus Center at George Mason University (2003-11) April 29, 2003. With Brian Mannix.

Comment on "Withdrawal of TMDL Water Quality Plans," submitted to the Environmental Protection Agency. *Public Interest Comment Series*, Regulatory Studies Program, Mercatus Center at George Mason University (2003-01), January 17, 2003.

Comment on "2002 Draft Report to Congress on the Costs and Benefits of Federal Regulation," submitted to the Office of Management and Budget. *Public Interest Comment Series*, Regulatory Studies Program, Mercatus Center at George Mason University (2002-02) May 28, 2002. With Brian Mannix and Jennifer Zambone.

Comment on "Request for Comment on National Primary Drinking Water Regulations for Arsenic," submitted to the Environmental Protection Agency. *Public Interest Comment Series*, Regulatory Studies Program, Mercatus Center at George Mason University (2001-14) October 31, 2001.

Comment on "2001 Draft Report to Congress on the Costs and Benefits of Federal Regulation," submitted to the Office of Management and Budget. *Public Interest Comment Series*, Regulatory Studies Program, Mercatus Center at George Mason University (2001-12), August 14, 2001. With Jay Cochran and Joseph Johnson.

Comment on "National Primary Drinking Water Regulations; Arsenic and Clarifications to Compliance and New Source Contaminants Monitoring," submitted to the Environmental Protection Agency. *Public Interest Comment Series*, Regulatory Studies Program, Mercatus Center at George Mason University (2001-5), May 7, 2001.

Addendum to comment on "Energy Conservation Program for Consumer Products: Clothes Washer Energy Conservation Standards," submitted to the Department of Energy.

Public Interest Comment Series, Regulatory Studies Program, Mercatus Center at George Mason University (2000-23), December 4, 2000.

Comment on "Proposed rule on the Accidental Release Prevention Requirements; Risk Management Programs Under the Clean Air Section 112(r) (7); Distribution of Off-Site Consequence Analysis Information," submitted to the Environmental Protection Agency. *Public Interest Comment Series*, Regulatory Studies Program, Mercatus Center at George Mason University (2000-12), June 8, 2000. With Daniele Schiffman.

Comment on "U. S. Postal Service's Proposed Delivery of Mail to a Commercial Mail Receiving Agency," submitted to the United States Postal Service. *Public Interest Comment Series*, Regulatory Studies Program, Mercatus Center at George Mason University (2000-9), April 13, 2000.

Comment on "Report to Congress on the Costs and Benefits of Federal Regulations," submitted to the Office of Management and Budget. *Public Interest Comment Series*, Regulatory Studies Program, Mercatus Center at George Mason University (2000-2), January 19, 2000.

Comment on "Lead and Lead Compounds; Lowering of Reporting Thresholds; Community Right-to Know Toxic Chemical Release Reporting; Proposed Rule. 40 CFR Part 372," submitted to the Environmental Protection Agency. *Public Interest Comment Series*, Regulatory Studies Program, Mercatus Center at George Mason University (1999-13), December 15, 1999.

Comment on "Draft Guidance for Improving Air Quality Using Economic Incentive Programs," submitted to the Environmental Protection Agency. *Public Interest Comment Series*, Regulatory Studies Program, Mercatus Center at George Mason University (1999-12), December 10, 1999.

Comment on "Control of Air Pollution from New Motor Vehicles: Proposed Tier 2 Motor Vehicle Emissions Standards and Gasoline Sulfur Control Requirements, Provision of Supplemental Information and Request for Comment. (64 FR 57827)," submitted to the Environmental Protection Agency. *Public Interest Comment Series*, Regulatory Studies Program, Mercatus Center at George Mason University (1999-11), December 1, 1999.

Comment on "Calculation of the Economic Benefit of Noncompliance in EPA's Civil Penalty Enforcement Cases: Notice (BEN)," submitted to the Environmental Protection Agency. *Public Interest Comment Series*, Regulatory Studies Program, Mercatus Center at George Mason University (1999-9), September 30, 1999.

Comment on "Control of Air Pollution from New Motor Vehicles: Proposed Tier 2 Motor Vehicle Emissions Standards and Gasoline Sulfur Control Requirements," submitted to the Environmental Protection Agency. *Public Interest Comment Series*, Regulatory Studies Program, Mercatus Center at George Mason University (1999-7), July 23, 1999.

Comment on "29 CFR 1910 Subpart U – Ergonomics, 'Working Draft of a Proposed Ergonomics Program Standard,'" submitted to the Department of Labor, Occupational Safety and Health Administration. *Public Interest Comment Series,* Regulatory Studies Program, Mercatus Center at George Mason University (1999-6), July 16, 1999. With Dianna Rowan.

Comment on "Procedures for Predetermination of Wage Rates; Labor Standards Provisions Applicable to Contracts Covering Federally Financed and Assisted Construction and to Certain Nonconstruction Contracts; Proposed Rule," submitted to the Department of Labor. *Public Interest Comment Series,* Regulatory Studies Program, Mercatus Center at George Mason University (1999-5), June 9, 1999. With John Charles Bradbury.

Comment on "Environmental Enforcement and Compliance Assurance Activities," submitted to the Environmental Protection Agency. *Public Interest Comment Series*, Regulatory Studies Program, Mercatus Center at George Mason University (1999-3), April 16, 1999.

Comment on "Persistent Bioaccumulative Toxic Chemicals – Toxic Release Inventory (TRI)," submitted to the Environmental Protection Agency. *Public Interest Comment Series*, Regulatory Studies Program, Mercatus Center at George Mason University (1999-2), April 1, 1999.

Comment on "Minimum Security Devices and Procedures and Bank Secrecy Act ('Know Your Customer')," submitted to the Federal Deposit Insurance Corporation. *Public Interest Comment Series*, Regulatory Studies Program, Mercatus Center at George Mason University (1999-1), March 8, 1999.

Comment on "Federal Motor Vehicle Safety Standards: Occupant Crash Protection, Advanced Air Bags," submitted to the National Highway Traffic Safety Administration. *Public Interest Comment Series,* Regulatory Studies Program, Mercatus Center at George Mason University (1998-4), December 17, 1998.

Comment on "Report to Congress on the Costs and Benefits of Federal Regulations," submitted to the Office of Management and Budget. *Public Interest Comment Series*, Regulatory Studies Program, Mercatus Center at George Mason University (1998-2), October 16, 1998.

Comment on "Proposal to Issue and Modify Nationwide Permits (Wetlands)," submitted to the U. S. Army Corps of Engineers. *Public Interest Comment Series,* Regulatory Studies Program, Mercatus Center at George Mason University (1998-3), November 30, 1998.

Comment on Ozone Transport (NOx)," submitted to the Environmental Protection Agency. *Public Interest Comment Series,* Regulatory Studies Program, Mercatus Center at George Mason University (1998-1), June 25, 1998.

Comment on "National Ambient Air Quality Standard for Ozone," submitted to the Environmental Protection Agency. *Public Interest Comment Series*, Regulatory Studies Program, Mercatus Center at George Mason University (1997-2), March 12, 1997.

Articles and Opinion Pieces

Forbes contributor http://www.forbes.com/sites/susandudley/

Frequent commentaries on regulatory policy at www.RegulatoryStudies.gwu.edu.

Occasional blogs at www.ExecutiveBranchProject.com and http://www.acus.gov/administrative-fix-blog

Supreme Court's EPA Mercury Ruling is a Victory for Common Sense Regulation, *The Conversation.* June 30, 2015.

Bill would close loophole on figuring regulations' impacts. *The Conversation.* June 19, 2015

Will US-EU trade talks devolve into game of chicken over regulatory ruffles? *The Conversation.* April 22, 2015.

Justices debate benefits and costs of EPA mercury power plant rule, *The Conversation*. March 31, 2015.

Improving Regulatory Accountability: Lessons from the Past, Prospects for the Future, U.S. Chamber of Commerce Blog, February 17, 2015.

Antisocial genesis of the social cost of carbon, Reuters, with Brian Mannix & Sofie Miller, October 10, 2013.

"Is Obama Really Reducing Regulatory Burdens?" *Washington Examiner*, with Sofie Miller, May 2, 2013.

"Government by regulation: So much for 'transparency,'" *Washington Times*, with Sofie Miller. March 21, 2013

"Repeal the RFS," *National Journal*, March 25, 2013

"Carbon Tax Least-Harmful Way to Cut Emissions," *National Journal*, November 19, 2012

"Regulation Should be More Accountable," *The Virginian-Pilot*, October 11, 2012

"Government Regulations: Rhetoric vs. Reality," *Politico*, September 13, 2012

Letter to the Editor, *Wall Street Journal*, August 28, 2012

"EPA Misrepresents Mercury Rule Benefits," *National Journal*, December 20, 2011.

"EPA's risks outweigh rewards for new mercury rule," *The Hill*, December 20, 2011.

"Regulating Past The Point of Diminishing Returns," *National Journal*, November 8, 2011.

"Measuring Regulatory Activity: What Can We Learn From the Unified Regulatory Agenda?" *Penn RegBlog*, September 27, 2011

"Ozone in the No-Zone," Daily Caller, September 6, 2011

"Don't overstate reg re-examination," Politico, August 24, 2011

"Congress Needs Its Own Regulatory Review Office," Penn RegBlog, August 10, 2011

"Prospects for Regulatory Reform," Penn RegBlog, July 7, 2011

"Happy 30th Anniversary, OIRA," *Administrative Fix*, Administrative Conference of the United States. May 16, 2011.

"Report on budgets of federal regulatory agencies," *Administrative Fix*, Administrative Conference of the United States. May 12, 2011.

"Cost of running regulatory agencies to reach $57.3 billion in 2012," The Daily Caller, May 11, 2011. With Melinda Warren.

"The Administrative Procedure Act at 65," The Daily Caller, March 1, 2011.

"What to do about unfunded mandates?" The Daily Caller, February 17, 2011.

"Why I support regulatory pay-go," The Daily Caller, February 7, 2011.

"President Obama's New Regulatory Policies," The Daily Caller, January 18, 2011.

"Alfred Kahn was a true American hero," The Daily Caller, January 2, 2011.

"Would you eat genetically-engineered salmon?" The Daily Caller, September 27, 2010.

"Let Congress Vote on Major Rules," Baltimore Sun, August 9, 2010. With Jeff Rosen. (Also published in the Daily Caller and the Atlanta Journal Constitution in September.)

"Watch for Hidden Taxes," Boston Globe, June 12, 2009. With Jeff Rosen.

"Regulatory Restraint," *Regulation* (Summer 2006) With Melinda Warren.

"The Regulators' Growing Budget," *Regulation* (Fall 2005)

"Canadian 'Smart Regulation,'" *Regulation* (Summer 2005)

"It's Not Just the Spending," *Tech Central Station* (August 29, 2005)

"Cooling Water Intake," *Regulation* (Spring 2005)

"States of Fear," Book Review, *The Frankenfood Myth: How Protest and Politics Threaten the Biotech, Revolution, Regulation* (Spring 2005). With Eileen Norcross.

"The Bush Administration Regulatory Record," *Regulation* (Winter 2004-2005)

"A Regulated Day in the Life," *Regulation* (Summer 2004)

"The Hidden Tax of Regulation," January 5, 2004

"The Price is Right," *TechCentralStation*, November 24, 2003

"Figures Full of Air," *Washington Post*, October 18, 2003.

"Finding Nemo's Worth," *Heartland Express*, August 2003. With Daniel Simmons.

"EPA Dodges a Rule," *Scripps Howard News Service*, July 15, 2003. With Daniel Simmons.

"Let OSHA take lead in ergonomics reform; Flexible policy can protect workers, but legislative bickering threatens progress," *Chicago Sun-Times*, July 21, 2001.

"Regulation Post 9/11," *National Review Online*. March 26, 2002.

"Consumers Reject US Spin Cycle On Washing Machines," *Bridge News*, January 5, 2001 (with Garrett Vaughn).

"Willy-Nilly Regulations: Climate of Haste Hurts Consumers," *Atlanta Journal Constitution*. January 2, 2001.

"Something Wicked This Way Comes," *Atlanta Journal Constitution*. July 27, 2000. With Wendy Gramm.

"EPA Speeds Ahead with Ill-conceived Vehicle, Gasoline Standards," *Republican-American*. December 20, 1999. With Wendy Gramm.

"One-Size Workplace Rules Won't Cure Job Injuries," *Sun-Sentinel*, Ft. Lauderdale, FL. December 2, 1999. With Wendy Gramm.

"Smarter Regulators Required," *Washington Times*, December 2, 1998. With Wendy Gramm.

"The Human Costs of EPA Standards," *The Wall Street Journal.* Monday, June 9, 1997. With Wendy Gramm.

Testimony

Testimony before the U.S. Senate Committee on Homeland Security and Government Affairs: A Review of Regulatory Reform Proposals. (September 17, 2015)

Testimony before a joint hearing of the U.S. Senate Committee on the Budget and Committee on Homeland Security and Government Affairs: Accounting for the True Cost of Regulation: Exploring the Possibility of a Regulatory Budget. (June 23, 2015)

Testimony before the U.S. Senate Subcommittee on Regulatory Affairs and Federal Management: Examining Practical Solutions to Improve the Federal Regulatory Process, Roundtable Discussion. (June 3, 2015)

Testimony before the Joint Economic Committee: Reducing Unnecessary and Costly Red Tape through Smarter Regulations. (June 26, 2013)

Testimony before the U.S. Senate Committee on Environment and Public Works, Subcommittee on Clean Air and Nuclear Safety, " Review of Mercury Pollution's Impacts to Public Health and the Environment." (April 12, 2012)

Testimony before the U.S. House of Representatives Committee on Science, Space, and Technology Subcommittee on Energy and the Environment, "Fostering Quality Science at EPA: Perspectives on Common Sense Reforms." (Nov. 30, 2011)

Testimony before the U.S. Senate Committee on Homeland Security and Governmental Affairs, "Federal Regulation: A Review of Legislative Proposals, Part II." (July 20, 2011)

Testimony before the U.S. House of Representatives Committee on the Judiciary, Subcommittee on Courts, Commercial and Administrative Law Hearing Information, "The APA at 65 – Is Reform Needed to Create Jobs, Promote Economic Growth and Reduce Costs?" (February 28, 2011)

Testimony before the U.S. House of Representatives Oversight and Government Reform Subcommittee on Technology, Information Policy, Intergovernmental Relations, and Procurement Reform. "Unfunded Mandates and Regulatory Overreach." (February 15, 2011)

Written testimony before the Committee on Homeland Security and Governmental Affairs, "Protecting Personal Information: Is the Federal Government Doing Enough?" (June 18, 2008) With Karen Evans.

Written testimony before the Information Policy, Census, and National Archives Subcommittee, Oversight and Government Reform Committee, U.S. House of Representatives, **"**Does Federal Statistical Data Adequately Serve People Living with Disabilities?" (June 4, 2008)

Testimony before the Committee on Science and Technology, Subcommittee Investigations and Oversight, U.S. House of Representatives, "Environmental Protection Agency's Integrated Risk Information System (IRIS)" (May 21, 2008)

Testimony before the Committee on Oversight and Government Reform, U.S. House of Representatives, **"**National Ambient Air Quality Standard (NAAQS) for Ozone" (May 20, 2008)

Testimony before the Committee on the Judiciary, Subcommittee on Commercial and Administrative Law, U.S. House of Representatives "Rulemaking Process and the Unitary Executive Theory" (May 6, 2008)

Testimony before the Committee on Small Business, U.S. House of Representatives, "improving the Paperwork Reduction Act for Small Businesses" (February 28, 2008)

Confirmation hearing before Homeland Security and Government Affairs Committee, U.S. Senate (November 13, 2006)

Panelist at White House Conference on the Economy, "Securing Our Economic Future: Tax and Regulatory Burdens" panel chaired by Treasury Secretary John Snow. (December 15, 2004).

Testimony before the House Subcommittee on Regulatory Reform and Oversight of the Committee on Small Business, U.S. House of Representatives, on "Reforming Regulation to Keep America's Small Business Competitive." May 20, 2004.

Testimony before the Committee on Government Reform Subcommittee on Energy Policy, Natural Resources and Regulatory Affairs, U.S. House of Representatives, on "Regulatory Accounting." February 25, 2004.

Written testimony before the Subcommittee on Regulatory Reform and Oversight Committee on Small Business, U.S. House of Representatives, on **"**The TRI Lead Rule: Costs, Compliance, and Science." June 13, 2002.

Testimony before the Committee on Government Reform Subcommittee on Energy Policy, Natural Resources and Regulatory Affairs, U.S. House of Representatives, on regulatory accounting. March 12, 2002.

Testimony before the Committee on Government Reform, U.S. House of Representatives, on the effect of the Army Corps of Engineers approach to wetlands protection on overall social welfare. October 6, 2000.

Testimony before the Senate Subcommittee on Clean Air, Wetlands, Private Property, and Nuclear Safety on the risk assessment underlying EPA's proposed ambient air quality standard for ozone. April 24, 1997.

Expert Witness testimony on behalf of the U.S. Department of Justice, *Cadillac Fairview/California Inc., v. Dow Chemical Co., et. al.* October 1995.